

August 2, 2013

Ms. Eileen L Furey
Acting Chief
Air Enforcement and Compliance Assurance Branch
United States Environmental Protection Agency
Region 5
77 West Jackson Blvd
Chicago, IL 60604-3590

RE: Veolia ES Technical Solutions, L.L.C.
Sauget, IL
Veolia's Comprehensive Performance Test Plans for Incinerators 2, 3 and 4

Dear Ms. Furey,

Veolia is in receipt of your July 26, 2013 letter regarding Veolia's Comprehensive Performance Test Plans for Incinerators 2, 3 and 4 and appreciates your response. On July 5, 2013, Veolia submitted its intent to commence the CPT and CMS Performance Evaluation by September 5, 2013 to USEPA, IEPA and Veolia's mailing list. As evident by this submittal, it has always been, Veolia's intention to commence testing by September 5, 2013 beginning with the Relative Accuracy Test Audit (RATA) as directed by USEPA Region 5. In fact, the consulting company that will be performing the test is mobilized to begin testing on that day and Veolia has spent a considerable amount of money in order to make this happen. With these commitments, it is Veolia's goal to resolve these remaining two issues.

With regards to the waste to be burned during the CPT, Veolia has incorporated into the CPT Plan the following as directed by USEPA Region 5 in your July 26, 2013 letter:

- a. Veolia will provide EPA, no later than 30 days prior to the CPT, hazardous waste profiles for each liquid and solid waste that will be incinerated during the CPT. Veolia has the option to change waste streams with concurrence from EPA if a particular stream demonstrates incompatibility issues with the spike material or other waste being incinerated. Veolia does not anticipate this happening but needs this flexibility if safety or WAP compliance issues are encountered.
- b. Veolia will sample the solid and liquid waste streams every 15 minutes and composite as previously agreed.
- c. Veolia will archive for 90 days a sufficient portion of each 15 minute sample to allow for further analysis.
- d. Veolia will provide to EPA analytical results performed on any liquid or solid waste stream to be used during the CPT by August 16, 2013. This will allow Veolia time to compile the information and ensure that the deadline is met. Many of the waste streams have been analyzed but certain analytical results are still pending and some of the waste streams have still not been received.

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The waste streams that Veolia has selected are representative of the types of waste fed on a regular basis. Veolia's waste feeds can change hourly based on what has been received and what is available for incineration. Also, based on the waste mix, the waste being fed into the incinerator can vary widely from day-to-day. The waste that Veolia has selected in terms of BTU, Chlorine, metals and ash content are consistent with what is incinerated every day.

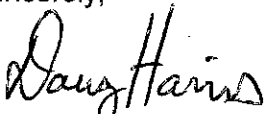
With regards to test conditions and operating modes, Veolia agrees with the EPA to operate at "normal conditions" during its performance of the CPT. Veolia will conduct the CPT at one test condition for Units 2, 3 and 4 at normal temperatures and use the average temperature for these runs to establish the OPL for D/F's. In this manner, Veolia will be able to provide emission data to the EPA that represent higher than the currently established OPL for minimum primary chamber temperature and use the average of the three runs to establish the new primary chamber temperature OPL for all three units. Although accepting these higher temperatures will reduce Veolia's operating envelope, in an effort to resolve this issue, Veolia is willing to conduct these tests and establish OPL's at higher than currently permitted primary chamber temperatures. Veolia is concerned about operating in multiple modes during the CPT testing due to the requirement of setting OPL's pursuant to 40 CFR § 1209 when testing for the individual emission standards. This would result in multiple OPL's for an emission standard and in turn, would require a complete reprogramming of the incinerator control system. In order to satisfy the Agency's directive for setting minimum temperature, Veolia is willing to run the CPT at normal temperature and accept the average temperature of the three test runs as its new low temperature OPL.

It is our goal to submit revised electronic copies of the CPT Plans for Incinerators 2, 3 and 4 by the close of business on Friday, August 2, followed up by hard copies which EPA should receive early next week.

Veolia is committed to working with USEPA, Region 5 in obtaining a CPT Plan approval and commencing testing on September 5, 2013 and appreciates the Agency's commitment in obtaining this goal. In light of the tight schedule, Veolia is willing to meet at any time if there are any remaining questions and appreciate the efforts of EPA in this matter.

If you have any questions, please call me at (618) 271-2804 or via e-mail at Doug.Harris@Veoliaes.com.

Sincerely,



Doug Harris
General Manager

cc: Mr. George Czerniak, USEPA
S. Argentieri, USEPA
S. Downey, USEPA
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J. Woolums, USEPA
EPA File